

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: October 12, 2004

Site Contact(s): Carolyn Hicks
Phone: 303-994-9555

Regulatory Contact: Harlen Ainscough
Phone: 303-692-3337

Agency: CDPHE

Purpose of Contact: Discuss RCRA Closures in Building 707 and characterization of debris waste removed as part of RCRA debris rule cleaning

Discussion:

Six RCRA secondary containment areas in Building 707 were washed and rinsed to meet RCRA closure requirements. These areas were all associated with mixed residue tanks in C-Pit (units 92.001 – 92.019) including ancillary piping from gloveboxes in the Modules to the C-Pit tanks, and the waste transfer line to Building 777. The data were provided to Mr. Ainscough on August 6, 2004 via email.

These areas included:

- G Module/G Corridor - portion under mixed residue piping
- A Module/H Corridor - portion under mixed residue piping
- C Pit - entire floor - mixed residue tanks, units 92.001 - 92.019
- C Module - portion under mixed residue piping
- D Module - portion under mixed residue piping
- E Module - portion under mixed residue piping

However, the RCRA rinsates did not meet the closure performance standards for all parameters.

Floors were then shaved or hydrolased to remove paint and some concrete for the purpose of radiological decontamination prior to building demolition. These activities allowed the debris treatment standard in 6 CCR 1007-3 Part 268.45 to be achieved, and thus these units met the closure performance standard in the B707 Decommissioning Operations Plan, Section 6.1.2, "Unit Removal in Conjunction with "Debris Rule" Treatment".

The floor shaving/hydrolasing debris (paint and concrete), generated as part of concurrent radiological decontamination/RCRA debris rule treatment, must be characterized and managed appropriately. The rinsate data, discussed below, support a non-hazardous waste determination for the debris.

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The volatile organics and metals in the rinsate were all well below regulatory levels for offsite disposal (RCRA LDR levels for organics and hazardous waste characteristic levels [TCLP] for metals.) Although the RCRA areas provided secondary containment for tanks and piping that contained F001 and F002 wastes, releases to secondary containment were cleaned up promptly, and the floors were washed/rinsed prior to shaving/hydrolasing, with the rinsate data supporting a "contained out" determination for the debris. In addition, a previous sample of floor shaving debris from H Module, comprised of paint and concrete, also was below TCLP levels for all metals.

Mr. Ainscough has concurred that these RCRA units in Building 707 have been closed by removal, and has concurred that the floor shaving/hydrolasing debris may be managed as non-hazardous low-level waste for disposal, based on the project conducting the appropriate decontamination and removal activities.

Contact Record Prepared by: Carolyn Hicks

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